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11/9/06
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~~SEALED ORIGINAL~~

(51)

IN THE "UNITED" STATES' OF DISTRICT COURT
FOR THE STATE'S OF DELAWARE

CURTIS M. COLLINS
PLAINTIFF

Ca.

5-739-SLR:

v.
WARDEN ET AL

RICK KEARNEY
Sgt CHANDLER
CG Berezansky
CG MULWIGANT



* NOW COMES THE PLAINTIFF CURTIS M. COLLINS *
TO DEPOSE DEFENDANTS" WITH THESE
WRITTEN" QUESTIONS TO"THE COURT'S

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2006 OCT -4 PM12:22
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C/o Berezansky

1*

IS IT TRUE THAT YOU HAVE A "HISTORY" OF
CAPTURING INMATES BEFORE AND
AFTER THEY ARE "HANDCUFFED AT S.C.I. PRISON

#2

IS IT TRUE THAT 90% OF YOUR DISCIPLINARY
REPORTS ON INMATES ACCURATELY AT CHOW TIMES
FEEDING THE INMATES AT S.C.I. PRISON

#3

WORKING AS A CORRECTIONAL OFFICER FOR
THE ~~SEX~~ STATE OF DELAWARE HAVE YOU EVER
BEEN PLACED OR HAVE PENDING ANY
INVESTIGATION CONCERNING ABUSE IN INMATES
AT S.C.I. PRISON.

#4

WORKING AS A CORRECTIONAL OFFICER FOR THE
STATE OF "DELAWARE" HAVE YOU BEEN SUED
BY AN "INMATE" AT S.C.I. ACCUSERING YOU OF
ABUSE OR THREATENING BEHAVIOR, IF SO
COULD YOU PLEASE STATE FOR THE RECORD HOW MANY
MEANINGFUL TIMES YOU BEEN SUED OR ACCUSED
OF INMATES ABUSE OR ANY OTHER THREATENING
BEHAVIOR'S BY INMATES HOUSED AT S.C.I. PRISON.

5#

IS IT TRUE THAT 82% PERCENT OF YOUR
DISCIPLINARY REPORTS FILED ON INMATES
ARE AFRICAN AMERICAN INMATES AT
S.C.I. PRISON

#6# Q BEREZANSKY

IS IT TRUE THAT OUT OF 90% PERCENT!
OF YOUR INT' COUNTER ARE "WITH" AFRICAN
AMERICAN "INMATES" RESOLVES IN THEM
BEING ASSAULTED" BY YOU CAPSTUN! BY YOU
BEFOR AND AFTER" THE INMATES ARE ALREADY
IN HANDCUFFS.

7# Sir

CANT YOU PLEASE TELL THE COURTS THAT YOU
^{AT} RAN MR. COLLINS IN THE CHOW HALL AND
ASSAULTED MR. COLLINS BY PUNCHIN MR. COLLINS
IN THE FACE IN FRONT OF A BUNCH OF OTHER
INMATES IN THE S.C.I. CHOW HALL

8 AS IT TRUE THAT YOUR JOB IS TO BE A
PROFESSIONAL OFFICER'S

9 WELL CANT YOU PLEASE TELL THE COURTS
WHY YOU USED PROFANITY ALL THE TIMES
WHEN TAKIN TO INMATES

10# HAVE YOU EVER BEEN ASSAULTED OR ABUSED
IN THE PASS BY AN AFRICAN AMERICAN
MALE" WHILE YOU WERE OUT OF UNIFORM
OR IN UNIFORM.

(5)

C/O MICHIGAN

CAN you PLEASE STATE AND OR DESCRIBE
WHAT TRANSPRIRED ON 8-6-05- IN THE

① # M.S.B. Chowhalla Between you AND THE
PLAINTIFF CURTIS COLLINS

② # AFTER THIS SO CALLED ALTERCATION
BETWEEN YOU AND THE PLAINTIFF IS
IT TRUE THAT AFTER THE PLAINTIFF WAS
HANDCUFFED AND SUBDUED WAS IT NECESSARY
IN YOUR EYES TO CONTINUE TO BEAT THE
PLAINTIFF AND SPRAY THE PLAINTIFF
WITH TWO CANS OF PEPPERS SPRAYS?

③ HAVE you ever SEEN A INCIDENT like
THIS BEFORE?

④ # OK HAVE you EVER LAID your HANDS OUT
ANY OTHER INMATE BEFORE WHILE THAT
PERSON HAS BEEN SUBDUED IN HANDCUFFS

⑤ ALSO WHAT IS your DEMEANOR TOWARDS OTHER
INMATES AT THE PRISON?

C/O MICHIGAN

#⑥# ISN'T IT TRUE THAT PROTOCOLS YOU FOLLOW OR ALLOWS YOU TO PLACE HANDS ON A INMATE BUT ONCE THAT INMATE IS SUBDUED YOU MUST STOP! WHY THEN YOU CONTINUE TO HIT AND OR CAUSE THE PLAINTIFF INJURIES WHILE HE WAS IN HANDCUFFS AND SUBDUED LYING FACE DOWN ON THE FLOOR?

#⑦# IS IT TRUE ON SET PROTOCOLS THE PLAINTIFF WAS ON THE GROUND AND DID NOT RESIST IN ANY WAY CAN YOU PLEASE TELL THE COURTS WHY? OR HOW THE PLAINTIFF GOT BROKEN RIBS AND A BUSTED HIP WHEN IN FACT THE PLAINTIFF WAS RESISTING IN ANY WAY?

#⑧# SIR ON THE STREETS DO YOU CONSIDER YOURSELF "A" VIOLENT PERSON?

#⑨# WELL CAN YOU DESCRIBE YOUR ACTION IN M.S.B. CHOWHALU "WHILE BEATING A" INMATE UP AND DOWN IN FRONT OF A BUNCH OF OTHER INMATES?

#⑩# ALSO FOR THE RECORD WITH ALL THESE SERIOUS QUESTIONS THAT WAS ASKED HERE TODAY WOULD YOU BE WILLIN TO TAKE A "BIG LIE DETECTOR TEST!"

Sgt.

Sgt. CHANDLER

#①

THE PLAINTIFF SEEN YOU WHILE HE WAS
LAYING ON THE GROUND, AND I NOTICED
THAT YOU WAS STANDING THERE LAUGHING YOUR
HEAD OFF AT THE SITUATION INSTEAD OF
STOPPING UNFAIR TREATMENT TOWARDS A
INMATE why then DIN'NT you "Sgt" PUT A
STOP TO WAS happening?

#②

Sgt.

HAVE YOU EVER SEEN OR HEARD A FELLOW
OFFICERS HASH OUT AT A INMATE BECAUSE
OF FAMILY PROBLEMS?

#③

Sgt. IS IT TRUE WHEN PLAINTIFF COLLINS
CAME TO YOU ABOUT A UNPROFESSIONAL
OFFICER'S BEREZANSKY BEING OUT OF
CONTROL?

#④

Sgt.

IS IT TRUE THAT OFFICER BEREZANSKY
RAN TOWARDS THE PLAINTIFF IN THE
"CHOWHALL" AND ASSAULTED THE PLAINTIFF
By punching THE PLAINTIFF IN THE FACE
FOR NO REASON AT ALL?

Sgt.

Sgt. CHANDLER

#(5)

IS IT THE TRUTH "WHEN AN INMATE" GET SERIOUSLY HURT, THEY MUST IMMEDIATELY BE TAKEN TO MEDICAL IN ANY EMERGENCY SITUATION?

#(6)

WHY THEN DIDN'T YOU SEE THAT THE PLAINTIFF GOT PROPER MEDICAL TREATMENT?

#(7) #

Sgt. IS IT TRUE YOU HAVE A PERSONAL VENDetta AGAINST THE PLAINTIFF? OR YOU JUST DON'T CARE ABOUT THE WELL BEING OF INMATES?

#(8) #

Sgt.

ALSO IS THE TRUTH THAT "S.C.I. IS A REAL RECAIL PRISON?"

#(9)

OK FOR THE RECORD WITH ALL THESE SERIOUS QUESTIONS THAT WAS ASKED HERE TODAY WOULD YOU BE WILLIN TO TAKE A BIG HIZ DETECTOR TEST?

#(10)

IS IT TRUE THAT ANY OFFICER WITH A HIGH RANK IS TO TAKE CHARGE WITHOUT ANY OFFICER WITH NO RANK YOU WERE THE ONLY HIGH RANK IN THE CHOWHALL WHY YOU DIDN'T YOU TAKE CHARGE OF THIS SITUATION?

"
CERTIFICATE OF SERVICES
"

"
I"

CURTIS M. COLLINS
hereby

O CERTIFY THAT ON THIS 10
DAY OF "2-06 I HAVE
HONDED "THESE" WRITTEN QUESTIONS TO DEPOSE
DEFENDANTS TO A DELAWARE CORRECTIONAL
CENTER PRISON GUARDS TO PLACE SAID WRITTEN
QUESTIONS TO DEPOSE IN A D.C.C. UNITED STATES
MAILING SYSTEM IN A PRE-PAID ENVELOPE
TO BE SENT TO THE DELAWARE DISTRICT COURT
AND:

*DEPUTY ATTORNEY GENERAL
D.P.P.T.
OF "JUSTICE" CARVEL STATE
OFFICE B.L.D.G. 820 N.
French ST. WILM/DEL 19801

* CLERK UNITED STATES
DISTRICT COURT 844
N. KING STR. LOCKBOX #18
WILM/DEL 19801-3570

* S.B.D.BIN128

By CURTIS M. COLLINS

cc.

D.C.C. B.L.D.G. 217 TREE C.U. 3
1181 PADDICK ROAD SMYRNA DE 1
19977

SBI#~~314128~~ UNIT C-U-3 Box D-5 Z-1
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



LEGAL MAIL

CLERK

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* UNITED "STATES" DISTRICT "Courts" *
OF "DELAWARE" 844 NORTH
KING "STREET" LOCKBOX #18
WILMINGTON "DELAWARE"
ZIP "19801-3570"



LEGAL MAIL